

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HARRY PASCAL, on behalf of himself and  
All others similarly situated,

Plaintiff,

-against-

BUREAU OF COLLECTION RECOVERY, INC.,

Defendant(s).

ANSWER

08 CIV 6218  
(Robinson, J)

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Defendant, by its attorney MEL S. HARRIS AND ASSOCIATES,  
LLC, answer plaintiff's complaint as follows:

1. Defendant admits being sued pursuant to the Fair Debt  
Collection Practices Act, but denies any violation thereof.

2. Defendant admits the allegations contained in paragraph  
"2" of the complaint.

3. Defendant admits the allegations contained in paragraph  
"3" of the complaint.

4. Defendant denies knowledge or information sufficient to  
form a belief as to each and every allegation contained in paragraph  
"4" of the complaint.

5. Defendant admits the allegations contained in paragraph  
"5" of the complaint.

6. Defendant denies each and every allegation contained in  
paragraph "6" of the complaint.

7. Defendant denies each and every allegation contained in paragraph "7" of the complaint.

8. Defendant denies each and every allegation contained in paragraph "8" of the complaint.

9. Defendant denies each and every allegation contained in paragraph "9" of the complaint.

10. Defendant denies each and every allegation contained in paragraph "10" of the complaint.

11. Defendant denies each and every allegation contained in paragraph "11" of the complaint.

12. Defendant admits the allegations contained in paragraph "12" of the complaint.

13. Defendant admits the allegations contained in paragraph "13" of the complaint.

14. Defendant denies each and every allegation contained in paragraph "14" of the complaint.

15. Defendant admits the allegations contained in paragraph "15" of the complaint.

16. Defendant admits the allegations contained in paragraph "16" of the complaint.

17. Defendant denies each and every allegations contained in paragraph "17" of the complaint.

18. Defendant denies the allegations contained in paragraph "18" of the complaint.

19. Defendant denies each and every allegation contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

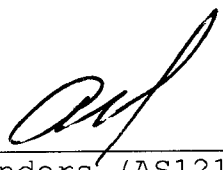
21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

22. Any violation of law by defendant, which is specifically denied, was not intentional and resulted from a bona fide error notwithstanding the maintenance of procedures reasonably adapted to avoid any such error.

WHEREFORE, the defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY  
August 11, 2008



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